

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION  
Case No. 7:23-cv-897

IN RE: )  
 )  
CAMP LEJEUNE WATER LITIGATION ) **JOINT NOTICE OF FILING OF**  
 ) **PROPOSED PROTOCOLS**  
 )  
This Document Relates To: )  
 )  
ALL CASES )  
 )

Plaintiffs' Lead Counsel and Co-Lead Counsel (collectively "Plaintiffs' Leadership") and counsel for Defendant United States of America ("Defendant," collectively with Plaintiffs' Leadership the "Parties") respectfully submit to this Honorable Court for consideration the following proposed protocols pursuant to Case Management Order No. 2, entered on September 26, 2023 (D.E. 23):

1. Stipulated Protective Order;
2. Stipulated Federal Rule of Civil Procedure 30 Deposition Protocol;
3. Federal Rule of Civil Procedure 27 Preservation Deposition Order; and
4. Stipulated Federal Rule of Evidence 502(d) Order.

WHEREFORE, the Parties respectfully submit this Joint Status Report.

DATED this 11th day of October 2023.

Respectfully submitted,

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